

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

Tammy Annette Luck

Case No. 16-31726-KRH

Debtor(s)

Chapter 13

5108 Yellowstone Drive
Petersburg, VA 23803

Last four digits of Social Security or Individual Tax-payer
Identification (ITIN) No(s), (if any): 7328

**MOTION FOR EXPEDITED HEARING
ON DEBTORS' MOTION TO CONTINUE THE AUTOMATIC STAY**

COMES NOW, the Debtor, by counsel, and as and for her Motion for an Expedited Hearing pursuant to Rule 9013 and Local Rule 9013(N), states as follows:

1. On April 7, 2016, Debtor filed a Petition in Bankruptcy.
2. On April 26, 2016, the Debtor filed a Motion to Continue the Automatic Stay Pursuant to 11 U.S.C. §362 (c)(3)(A) and (B) and Notice of Motion.
3. Counsel has requested a hearing before the Court on Wednesday, May 4, 2016 at 12:00 p.m. to be heard on this Motion.

Tammy Annette Luck

/s/ Brian K. Stevens

Brian K. Stevens, Esq., VSB#25974

America Law Group, Inc.

207A South Main Street

Blackstone, VA 23824

(434) 292-6529

CERTIFICATION

I, Brian K. Stevens, pursuant to Local Rule 9013 (N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence.

3. This request could not be resolved without a hearing.

/s/ Brian K. Stevens

Brian K. Stevens, Esq.

America Law Group, Inc.

207A South Main Street

Blackstone, VA 23824

Counsel for Tammy Annette Luck

CERTIFICATE OF SERVICE

I hereby certify that on this April 26, 2016, a copy of the foregoing Motion was electronically transmitted and/or mailed/faxed to Carl M. Bates, Chapter 13 Trustee, P. O. Box 1819, Richmond, VA 23218-1819, the U.S. Trustee at 701 E. Broad Street, Richmond, VA 23218, and to all creditors named below and parties in interest requesting electronic notice.

/s/ Brian K. Stevens

Brian K. Stevens, Esq.

CREDITORS:

Brock & Scott
484 Viking Drive, Suite 203
Virginia Beach, VA 23452

Ocwen Loan Servicing
P.O. Box 660264
Dallas, TX 75266

Treasurer of Dinwiddie
P.O. Box 178
Dinwiddie, VA 23841

US Office of Personnel
1900 E Street NW
Washington, DC 20415